

Three Rivers Local Plan 2026-2042 Pre-Submission Regulation 19 Consultation September 2026

CPRE Hertfordshire representations on:

Policy SP1 - Overall Levels of Growth

Policy SP2 - Overarching Policy on Sustainable Development

Policy SP3 - Infrastructure Delivery

Policy SP4 - Local Distinctiveness and Place Shaping

Policy GB1 - Green Belt

Q. 1 I can confirm that I have read, understood and I agree to the above information about how my data will be used and shared.

Answer: I agree

Q. 2 Please confirm your name.

Answer: Christopher John Berry

Q. 3 Please confirm your full address including post code.

Answer: CPRE Hertfordshire, 31A Church Street, Welwyn, Herts. AL6 9LW

Q. 4 Email address to be added to Local Plan consultation database.

Answer: planning@cpreherts.org.uk

Q. 5 Are you responding in an official capacity?

Answer: Yes (as Planning Manager for CPRE Hertfordshire)

Q. 6 To which part of the Local Plan does this representation relate?

Answer: Policy

Q. 7 Please provide details of the paragraph number, policy name/number or map.

Answer: SP1 - Overall Levels of Growth

Q. 8 Do you consider the Local Plan is legally compliant?

Answer: No

Q. 9 Do you consider the Local Plan is sound?

Answer: No

Q. 10 Please give details of why you consider the Local Plan is not legally compliant or is unsound. If you wish to support the legal compliance or soundness of the Local Plan please also use this box to set out your comments.

Answer:

Policy SP1 - Overall Levels of Growth

The Local Plan is neither legally compliant nor sound in respect of the scope and function of Policy SP1 - Overall Levels of Growth.

The Council indicates that the provision of housing in the Draft Local Plan represents approximately 77% of the standard method housing need calculation of 12,032 dwellings. This figure has been arrived at through the recent inappropriate action by the Secretary of State for Housing, Communities and Local Government in directing the inclusion of additional housing growth to that previously identified by the Council in the Regulation 18 Part 4 public consultations.

The Planning and Compulsory Purchase Act 2004 provides for the preparation of the Local Plan by a Local Planning Authority with powers for the Secretary of State to intervene if necessary, mainly under Section 21 if he believes that the Local Plan is unsatisfactory.

CPRE Hertfordshire does not believe that it is appropriate for the Secretary of State to intervene in the preparation of the Three Rivers Local Plan which previously took account of the specific local conditions and circumstances, particularly with respect to the significance and constraints posed by the designated protected land which comprises virtually all of the non built-up land in the District area.

Three Rivers District Council has been preparing the Draft Local Plan according to the Local Plan Regulations prior to the intervention of the Secretary of State and taking account of the results of the required public consultations. It is perverse of the Government to take no account whatsoever of those consultations, and in fact impose major additional development proposals, opposing the considered position of the Council and the large majority of those who responded to the consultations.

Such a position by the Government challenges the integrity of the planning system which is based on the local democratic control of development decisions which is being undermined by successive recent Government actions.

Specific concern may be raised with regard to the scope and findings of the Urban Capacity Study referenced in the Reasoned Justification to the Policy. The Study does not address the

full potential of previously developed land to provide housing capacity, because it specifically excludes from consideration existing built residential and employment areas unless promoted by their owners at the time of the call for sites which is likely to lead to significant underestimates of land available.

Q. 11 Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. You will need to say why each modification will make the Local Plan legally compliant or sound. It would be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Answer:

Policy SP1 is misconceived with regard to the expectations for growth which are identified through the use of a standard method for housing provision which is entirely unrelated to the local conditions and circumstances of the District. It is wholly inappropriate for the first strategic policy of the Three Rivers Local Plan to identify the provision of housing to the exclusion of other land uses and activities.

This gives undue priority to the provision of one form of development instead of developing a comprehensive land use and transport plan for all sectors and activities, balancing economic, social and environmental objectives affecting development, as required by the National Planning Policy Framework.

The initial strategic policy of a Local Plan should be concerned with the identification of truly sustainable development as its primary objective in line with the sustainability requirements of the national Planning Policy Framework and incorporate the twin principles of the promotion of development and protection of undeveloped land. The Three Rivers District Council area includes critically important areas of open countryside which are under direct threat from development which is both damaging and unnecessary.

Specifically, the achievement of sustainable development is fundamentally challenged by the imposed inclusion of Sites H9, H37 and H40 which is discussed further in the representation made to Policy GB1.

Q. 12 If you have evidence to support your representation, please upload this here.

Answer: None

Q. 13 If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

Answer: Yes

As you wish to participate in the hearing session(s), please outline why you consider this to be necessary.

Answer:

To explain CPRE Hertfordshire concerns relating to Policy SP1 in order to ensure that full consideration is given to protected Green Belt countryside, the natural environment, waterways, valued green spaces and landscapes.

About You Qs.14 to 17

Prefer not to answer

Q. 18 I agree to the Terms of Use and Privacy Policy for Engagement HQ.

Answer: I agree

Answers for Policy SP2 - Overarching Policy on Sustainable Development

Q. 10 Please give details of why you consider the Local Plan is not legally compliant or is unsound. If you wish to support the legal compliance or soundness of the Local Plan please also use this box to set out your comments.

Answer:

Policy SP2 - Overarching Policy on Sustainable Development

The Council is not being permitted to adopt a sound approach to promote sustainable development due to the Government intervention in the Local Plan preparation process.

As identified in previous consultation responses at Regulation 18, statements of commitment to the amelioration of climate change and related environmental imperatives are meaningless without specific policy and projects for their achievement.

This Policy is a series of general objective statements which repeat previously stated goals and aims for the Draft Local Plan without elaboration. It is a wholly inadequate statement of the principle of protection of natural environments which is at odds with the promotion of damaging and unnecessary development on protected land.

The contribution of previously developed land within the District area is significantly underestimated based on experience elsewhere and there is no indication that this matter will receive the priority attention that is necessary to reduce the use of open countryside for development.

Q. 11 Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. You will need to say why each modification will make the Local Plan

legally compliant or sound. It would be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Answer:

Remove it as it is a superfluous re-statement of the aims and objectives of the Local Plan and contains no additional policy direction.

Answers for Policy SP3- Infrastructure Delivery

Q. 10 Please give details of why you consider the Local Plan is not legally compliant or is unsound. If you wish to support the legal compliance or soundness of the Local Plan please also use this box to set out your comments.

Answer:

Policy SP3- Infrastructure Delivery

Policy SP3 is a wholly inadequate treatment of the significance of infrastructure to future development in the District and thus prejudices the soundness of the Draft Local Plan.

There is no indication of the constraints on water borne utilities and the implications for crucial water courses that include globally significant chalk streams which have critical functions for drainage as well as water supply and water-borne waste disposal.

There is no adequate treatment of transport and movement in the rural areas where residents and businesses are entirely dependent on private and motorised vehicles for all purposes.

It is meaningless to state as an objective the identification of infrastructure as a “pre-requisite for development” when there are no identified resources available to provide it. Again this Policy is a series of general aims, not policy.

Q. 11 Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. You will need to say why each modification will make the Local Plan legally compliant or sound. It would be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Answer:

Remove it in its present form as it repeats previously stated aims and objectives for the Draft Local Plan.

Answers for Policy SP4 - Local Distinctiveness and Place Shaping

Q. 10 Please give details of why you consider the Local Plan is not legally compliant or is unsound. If you wish to support the legal compliance or soundness of the Local Plan please also use this box to set out your comments.

Answer:

Policy SP4 - Local Distinctiveness and Place Shaping

Policy SP4 is unsound in that it lacks recognition of the open countryside in Three Rivers that is a critically significant element of local distinctiveness in the District area. This is highly valued by residents, businesses and visitors and is under constant and increasing threats to its survival due to the introduction of grey belt and reduction of constraints to the presumption for development in the National Planning Policy Framework.

There is no mention in the Policy of the single largest land designation in the District, that is, the London Metropolitan Green Belt, that has served to prevent urban sprawl and the encroachment of development into the countryside. This constitutes a major and critical omission and jeopardises the balance between economic, social and environmental objectives which are required by the National Planning Policy Framework as intrinsic to both policy-making and decision-taking.

The inadequacy of this Policy is heightened by the results of the recent Stage 4 Green Belt Review prepared by Ove Arup and Partners in February 2026 which identifies “Broad areas of Fundamental Importance” in Table 9. Further details of the implications of inclusion are provided in our response to Policy GB1 below.

It is clear that the proposed allocation of these areas for development should be considered as fundamentally undermining the purposes of the Green Belt as a whole, challenging the requirements of the National Planning Policy Framework in this respect. Such an approach, together with the external imposition of sites by the Secretary of State prejudices the soundness of the Draft Local Plan.

Q. 11 Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. You will need to say why each modification will make the Local Plan legally compliant or sound. It would be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Answer:

The Policy should include provisions for the inclusion of the most significant land designation in the District with regard to its critical role in achieving a balanced consideration of the factors involved in policy making and development decisions.

Answers for Policy GB1 - Green Belt

Q. 10 Please give details of why you consider the Local Plan is not legally compliant or is unsound. If you wish to support the legal compliance or soundness of the Local Plan please also use this box to set out your comments.

Answer:

Policy GB1 - Green Belt

Policy GB1 is fundamentally unsound in that it does not comply with national Green Belts policy as identified in the National Planning Policy Framework which states the essential features of Green Belts as “their openness and permanence” (NPPF 2026, Chapter 13). The Policy also ignores a key purpose of the Green Belt in the Three Rivers District area which is to prevent the urban sprawl of Greater London into Hertfordshire.

From the initial inception of a Green Belt around London with the publication of the Green Belt (London and Home Counties Act) Act 1938, the Hertfordshire County Development Plan 1951 established the extent of the Green Belt in the county. Subsequent reviews of the London Metropolitan Green Belt and the Hertfordshire County Structure Plan, approved in 1979, established the outer boundary of the Green Belt which has remained to the present.

The clear purpose of the Green Belt in Hertfordshire, including Three Rivers District, is thus to prevent the outward sprawl of Greater London. It is entirely inappropriate to consider towns in Hertfordshire as constituting the “large urban areas” referenced in the NPPF with regard to the first purpose (a) of the London Metropolitan Green Belt.

All areas of the London Green Belt fulfil the purpose of preventing the sprawl of the capital, but it is particularly relevant to Three Rivers where virtually all the non built-up land in the District area is designated as protected. This concern is also relevant to purpose b) of the Green Belt which relates to the coalescence of settlements which is happening to a significant extent in southern Hertfordshire.

The main settlements in the County have taken place along linear routes out of London and there is growing pressure on towns and villages to an extent that is jeopardising the principle of the protection afforded by Green Belt. The principle of defining Areas of Fundamental Importance can be welcomed but this is being seriously undermined by recent Government actions in promoting grey belt and enhancing the presumption for development as noted in the most recent National Planning Policy Framework (August 2026).

As noted in the response to Policy SP4, specific objection may be raised to three sites required to be included in the Draft Local Plan by the Secretary of State which are identified as “Broad areas of fundamental importance” in Table 9 of the Part 4 Green Belt Review (Ove Arup and Partners Ltd, February 2026). These areas, identified as Area ID 1 to 4 in Table 9

(op cit.) include Draft Local Plan proposed sites H9, H37 and H40 that are described as being “deemed of fundamental importance to the wider Green Belt” specifically in respect of preventing sprawl and the unrestricted spread of major settlements in the District, such that proposed development in the Kings Langley and Abbots Langley area contributes to challenging the integrity of the Green Belt as a whole.

Together the sites constitute a contribution to both purposes a) and b) of the Green Belt, which may be cited as preventing them from being determined as grey belt. These sites constitute critical areas preventing the coalescence of settlements leading to the merging of Watford, Bushey, Hemel Hempstead, Rickmansworth, St Albans and the expansion of north London and should be removed from the Draft Local Plan.

Effectively ignoring the results of the Green Belt Review in this respect calls into question the integrity of the decision to include sites in “Broad areas of fundamental importance” in proposed allocations for the Draft Local Plan. It is becoming clear through recent decisions on Green Belt planning applications, both as a result of planning appeals and Council determinations that grey belt is an existential threat to the Green Belt as a whole.

The promotion of grey belt as presently defined through Local Plans is deeply damaging to open countryside and the requirements of the National Planning Policy Framework to maintain the “openness and permanence” of Green Belts (NPPF 2026, Chapter 13). Continued application of grey belt thus undermines the soundness of the Draft Local Plan.

Q. 11 Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. You will need to say why each modification will make the Local Plan legally compliant or sound. It would be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Answer:

The section on Green Belt, including Policy GB1, should be re-written to reflect the original purpose of the London Metropolitan Green Belt to prevent the outward sprawl of Greater London and keep existing countryside permanently open. This will lead to the development of local criteria and the re-appraisal of the allocation of sites to provide an appropriate context for protecting the Green Belt in Three Rivers.

11th September 2026